



**U.S. Department of Justice**

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September 30, 2022

**BY ECF**

Hon. Zahid N. Quraishi  
United States District Judge  
United States District Court  
402 E. State Street  
Trenton, New Jersey 08608

Re: United States v. State of New Jersey, et al. (21-cv-15031)

Dear Judge Quraishi:

At the request of Monitor Jane Parnell, and pursuant to paragraph 114 of the Settlement Agreement and Consent Decree, *see* ECF No. 12, the parties jointly submit the Monitor's proposed budget to the Court for its approval. Counsel for Defendants has reviewed and consents to this submission to the Court.

Respectfully Submitted,

Steven H. Rosenbaum  
Chief, Special Litigation Section  
Civil Rights Division

Philip R. Sellinger  
United States Attorney  
District of New Jersey

By: /s/ Kerry Dean  
Kerry Dean  
Deputy Chief

By: /s/ Kelly Horan Florio  
Kelly Horan Florio  
Senior Civil Rights Counsel

cc: Matthew Boxer, Esq.  
Rachel Moseson Dikovics, Esq.

Proposed Monitoring Budget		This is an estimated budget for time and travel costs. All reimbursements for travel will be based on actual costs. The monitor will make every effort to obtain the Federal per diem for hotel rates. Reimbursements for professional fees of \$200 per hour are based on actual hours worked and all invoices will include a detailed account of hours and work provided.						
Date/ Monitoring Activity	Site Visits	Site Visit #Hours	Fee-\$200/hour	Work at Home #Hours	Fee-\$200/hour	Supplemental Assistance	Total All Activity Costs	
Description	Description	Hours	Total Cost	Hours	Total Cost	Cost	Total	
August 2022. Review documents sent by NJDOC. Prepare list of persons to interview, questions to ask, and documents to review during September compliance visit. Begin drafting narrative compliance report and monitoring tool for 2nd				60	\$12,000.00		\$12,000.00	
Sept 2022 -Review documents sent by NJDOC to ensure compliance with Settlement agreement . Prepare for compliance visit and begin drafting 2nd compliance report. Compliance Visit September 11 - 16. 6 days/5 nights. Travel Expenses:	September 11 - 16	60	\$14,340.00	40	\$8,000.00		\$22,340.00	

October 2022 - Finalize Compliance Report and Monitoring Tool. Continue all activities that support compliance assessment. Continue to review and provide feedback on training curriculum and Level 1 and III policies. Phone calls, emails, and conference calls with the DOJ and NJDOC. <small>Est. 60 hours</small>				80	\$16,000.00		\$16,080.00
November/December 2022 and January 2023 - Phone calls, emails, and conference calls with the DOJ and NJDOC. Review documents. Continue all activities that support compliance assessment. Continue to review and <u>provide feedback on training</u>				180	\$36,000.00		\$36,000.00
February 2023 - Review documents sent by NJDOC. Prepare list of persons to interview, questions to ask, and documents to review during March 2023 compliance visit. Begin drafting narrative				80	\$16,000.00		\$16,000.00

March 2023 - Review documents sent by NJDOC to ensure compliance with Settlement agreement . Prepare for compliance visit and begin drafting 3rd compliance report. Compliance Visit - 6 days/5 nights. Travel Expenses: Airfare \$600.00; Hotel \$800.00; Per Diem \$400.00; Rental Car/Gas/Parking \$600.00; Note: will bill for actual costs	On Site Visit - 6 days/5 nights	60	\$14,400.00	40	\$8,000		\$22,400.00
April 2023 - Finalize 3rd Compliance Report and Monitoring Tool. Continue all activities that support compliance assessment. Continue to review and provide feedback on training curriculum and Level 1 and III policies. Phone calls, emails, and conference calls with the DOJ and NJDOC.				70	\$14,000.00		\$14,000.00
May, June, and July 2023 - Work at home. Phone calls, emails, and conference calls with the DOJ and NJDOC. Continue all activities to support compliance assessment. Continue to review and provide feedback on training curriculum and Level 1 and III policies. Estimate 60 hours/month				180	\$36,000.00		\$36,000.00

Outside Assistance-Clerical, Other Correctional Consultants, Editor (as needed), Rates vary. Average \$125.00/hour				80		\$10,000.00	\$10,000.00
Totals		120	\$28,740.00	648	\$146,000.00	\$10,000.00	\$184,820.00

SO ORDERED:  
s/ Zahid N. Quraishi, U.S.D.J.  
Dated: 10/3/2022